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**BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company for)
Approval of the Retirement of Diablo Canyon Power) A.16-08-006
Plant, Implementation of the Joint Proposal, And) (filed August 11, 2016)
Recovery of Associated Costs Through Proposed)
Ratemaking Mechanisms.)
(U 39 E))

**MOTION FOR PARTY STATUS
OF THE
IMPERIAL IRRIGATION DISTRICT**

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September 15, 2016

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**MOTION FOR PARTY STATUS
OF THE
IMPERIAL IRRIGATION DISTRICT**

I. INTRODUCTION

Pursuant to Rule 1.4(a)(4) of the Rules of Practice and Procedure of the Public Utilities Commission of the State of California (“Commission”), the Imperial Irrigation District (“IID”) respectfully moves for party status in the above-captioned proceeding, and states as follows:

II. IDENTITY OF IMPERIAL IRRIGATION DISTRICT AND BASIS FOR THE INTERVENTION

Established in 1911, IID is located in Southern California, organized and operated under the laws of the State of California, which undertakes both electric and water operations. With regards to its electric operations, IID owns and operates facilities for the generation, transmission, distribution, purchase, and sale of electric power and energy at wholesale and retail.

On August 11, 2016, Pacific Gas and Electric Company (“PG&E”) submitted an Application to the Commission, requesting approval of the retirement of the Diablo Canyon Power Plant (“Plant”), implementation of a Joint Proposal among PG&E and other parties to

facilitate retirement of the Plant, and recovery of costs associated with the Plant's retirement through proposed rate mechanisms.

PG&E relies upon certain methodologies and expenses approved by the Commission, including cost allocation, for rates charged to IID. IID has an interest in the determination of such methodologies and expenses, as PG&E proposes in the instant Application, and will review PG&E's documentation of both, including through discovery and other procedures ordered by the Commission, to determine the appropriateness of PG&E's positions. Among the matters of concern includes PG&E's "support [of] a change in existing policies to allow allocation of resource costs for integration and storage through the ['California Independent System Operator Corporation's ('CAISO')] Transmission Access Charge ('TAC')." Joint Proposal § 2.5 at 9. IID and merchant generators within IID's service territory pay or are otherwise impacted by the CAISO TAC rate, and therefore, have an interest in any Application, such as the instant filing, that may purport to foster the change or increase of the CAISO's TAC. In addition, the prospect of storage or other generator integration costs being included in transmission costs would constitute a novel approach to recovery of generation costs, inconsistent with electric industry practice and precedent, and has the potential to lead to a stark increase in transmission rates through the CAISO TAC. Such a proposal also raises questions as to whether PG&E intends to turn over control of certain storage and other generation resources to the operational control of the CAISO. IID's participation would allow it to explore PG&E's proposals on such matters. IID's participation will pertain to the issues for decision by the Commission with respect to the above-captioned filing by PG&E.

III. SERVICE

For purposes of receipt of all correspondence, pleadings, orders and notices in this proceeding, the following IID representative should be placed on the service list under the “party” designation:

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In addition, IID requests that the following IID representatives be placed on the service list under the “information only” designation:

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IV. CONCLUSION

For the above reasons, the Imperial Irrigation District respectfully requests that the Commission grant its Motion for Party Status.

Dated: September 15, 2016, at Sacramento, California.

Respectfully submitted,

By: /s/ Sean M. Neal

Sean M. Neal

Attorney for the Imperial Irrigation District

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